

REQUEST GRANTED.

The Parties are given until March 11, 2022 to confer regarding possible amendments to the Consent Decree.

/s/ Solomon Oliver, Jr.

United States District Judge
2/28/2022

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF CLEVELAND,

Defendant.

) CASE NO.: 1:15CV1046
)
) JUDGE SOLOMON OLIVER, JR.
)
)
)
) JOINT STATUS REPORT REGARDING
) CITY OF CLEVELAND CHARTER
) AMENDMENTS
)

In accordance with its obligations under recently adopted amendments to Section 115 of its Charter, the City of Cleveland filed a motion (Dkt. # 389) on December 2, 2021 to modify the Settlement Agreement (“Agreement”) in this matter (Dkt. # 7-1). The Agreement provides that any “changes, modifications and amendments” are to be made through joint agreement of the Parties, and “will be effective if approved by the Court.” (Dkt. #7-1, p. 96). To allow for discussion between the United States and the administration of newly elected Mayor Justin Bibb of potential modifications to the Agreement, the United States requested time until February 18, 2022 (Dkt. # 394).

Since that time, the Parties have worked independently and together to determine what potential amendments may be appropriate in light of Charter Section 115. We have made meaningful progress toward this goal. These issues are of great significance to the Cleveland community, the protection of civil rights, and the provision of public safety, however, and the Parties are continuing to work to ensure that the rights protected by the Agreement and the will of the voters of Cleveland are respected. To permit the Parties to give this matter the close

attention that it warrants, we request further forbearance on consideration of the motion until March 16, 2022.

CONCLUSION

The Parties respectfully request that the Court grant the parties until March 16, 2022 to consider any proposed changes to the Agreement in accordance with the modification process set forth in the Agreement.

Respectfully submitted,

FOR THE UNITED STATES

STEVEN J. PAFFILAS
Civil Chief
Northern District of Ohio

/s/ Michelle L. Heyer

Michelle L. Heyer (OH: 0065723)
Sara E. DeCaro (OH: 0072485)
Assistant U.S. Attorneys
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
(216) 622-3686 (Heyer)
(216) 622-3670 (DeCaro)
(216) 522-2404 (FAX)
Michelle.Heyer@usdoj.gov
Sara.DeCaro@usdoj.gov

KRISTEN M. CLARKE
Assistant Attorney General
Civil Rights Division

STEVEN H. ROSENBAUM
Chief
Special Litigation Section

/s/ Timothy D. Mygatt

Timothy D. Mygatt
Deputy Chief
R. Jonas Geissler
Acrivi Coromelas
Trial Attorneys
United States Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Tel: (202) 353-1091; Fax: (202) 514-4883
Email: Timothy.Mygatt@usdoj.gov
Email: Jonas.Geissler@usdoj.gov
Email: Acrivi.Coromelas2@usdoj.gov

FOR THE CITY OF CLEVELAND

MARK GRIFFIN
Chief Legal Counsel
City of Cleveland

By: /s/ Gary S. Singletary

Gary S. Singletary (OH: 0037329)
Chief Counsel
City of Cleveland
601 Lakeside Avenue, Room 106
Cleveland, Ohio 44114-1077
Tel: (216) 664-2737
Fax: (216) 664-2663
gsingletary@clevelandohio.gov